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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma, ex a.
Plaintiff (s)

FILED
MAY 4 2006
Phil Lombardi, Clerk
U.S. DISTRICT COURT

vs.

Case Number 4:05-cv-00329-TCK-SAJ

Tyson Foods, et al.
Defendant (s)

OBJECTION TO SUBPOENA

COMES NOW Raymond C. Anderson and Shannon Anderson, by and through their attorney, Carrie Griffith, and objects to subpoena issued against them by Plaintiffs for the following reasons:

1. The subpoena requires Raymond C. Anderson and Shannon Anderson to allow Plaintiffs to perform soil sampling, rainfall runoff sampling, and repeated groundwater sampling of their property.
2. The subpoena appears to be directed towards obtaining information about waste that may have been applied to Raymond C. Anderson and Shannon Anderson's property.
3. It is Raymond C. Anderson and Shannon Anderson's assumption that the Plaintiffs are interested in poultry waste, although the subpoena is not specific as to the type of waste it covers.
4. The subpoena is not specific as to the time periods of waste application it covers.
5. Neither Raymond C. Anderson nor Shannon Anderson used the property for any kind of poultry operation.

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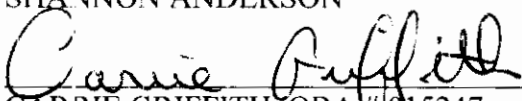
6. Neither Raymond C. Anderson nor Shannon Anderson's have used fertilizer obtained from poultry waste on their property for at least four (4) years.

7. Neither Raymond C. Anderson nor Shannon Anderson are parties to this action.

WHEREFORE, Raymond C. Anderson and Shannon Anderson, having objected to the Plaintiffs' subpoena, request this court to quash the subpoena, for any reimbursement of any costs they may have in regards to this matter, for their attorney fees in regards to this matter, and for any other relief the court may deem just and proper.

RAYMOND C. ANDERSON
SHANNON ANDERSON

By:


CARRIE GRIFFITH, OBA #015247


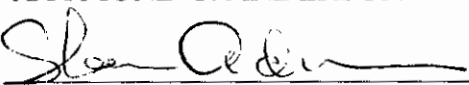
Attorney for Raymond C. Anderson
and Shannon Anderson
114 S. Broadway Street
Siloam Springs, AR 72761
479-524-2234 Phone
479-524-6244 Fax

VERIFICATION

STATE OF ARKANSAS
COUNTY OF BENTON

)
) SS.

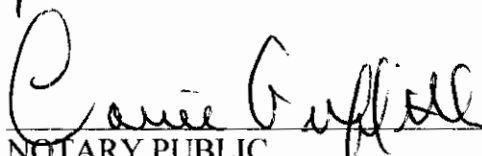
We, Raymond C. Anderson and Shannon Anderson, of lawful age, having been first duly sworn upon oath, state that the allegations and facts set forth in the above and foregoing Objection to Subpoena are true and correct to the best of our information and belief.

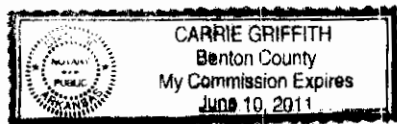

RAYMOND C. ANDERSON

SHANNON ANDERSON

Subscribed and sworn to before me, a Notary Public, by Raymond C. Anderson and Shannon Anderson, on this 2 day of May, 2006.

My Commission Expires:

6-10-2011

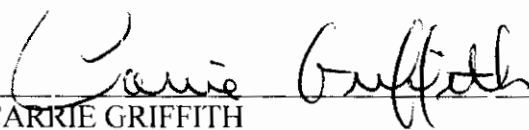

NOTARY PUBLIC



CERTIFICATE OF SERVICE

I, Carrie Griffith, do hereby certify that I have served a true and correct copy of the foregoing Objection to Subpoena to the following via U.S. Mail, with proper postage prepaid, and via fax to number 918-583-1549 on this 2nd day of May, 2006.

Mr. Richard T. Garren
Attorney for Plaintiffs
502 W. 6th St.
Tulsa, OK 74119


CARRIE GRIFFITH